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3 The Honorable Robert S. Lasnik
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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

JOHN T. GOHRANSON, individually, and as
Personal Representative of the Estate of
Lindsay M. Kronberger,

Plaintiff,

vs.

SNOHOMISH COUNTY, a municipal
Corporation in the State of Washington, et al.,

Defendants.

NO. C16-01124-RSL

STIPULATION AND [PROPOSED]
AGREED ORDER EXTENDING THE
DEADLINE FOR DISCLOSURE OF
EXPERT REPORTS

**NOTED ON MOTION CALENDAR:
AUGUST 15, 2017**

STIPULATION

COME NOW the parties, by and through their respective counsel of record and hereby stipulate and request that the Court enter an order extending the deadline for disclosure of expert reports from September 6, 2017 to October 6, 2017, considering the following:

1. The deadline for disclosure of expert reports is September 6, 2017, pursuant to the Court's Minute Order Setting Trial Date and Related Dates (Dkt. #22).

1 2. The parties have recently begun the process of scheduling and coordinating
2 numerous witness depositions for August and September 2017. It is anticipated that the parties
3 are unable to complete this process prior to the deadline of expert reports by September 6,
4 2017. Any information gained by the parties from these witness depositions may be relied
5 upon by the experts in forming their opinions.

6 4. The parties met and conferred and believe that good cause exists for the Court
7 to grant the parties' stipulated request for extending the deadline for disclosure of expert
8 reports from September 6, 2017 to October 6, 2017.

9 5. The parties further seek to clarify that by operation of FRCP 26(a)(2)(D)(ii), the
10 deadline for expert rebuttal reports will be 30 days after the deadline for disclosure of expert
11 reports. Should the Court grant the parties stipulation, the new deadline for expert rebuttal
12 reports will now be Monday, November 6, 2017, as the 30th day is a Sunday.
13

14 6. The parties do not anticipate that the new deadline for disclosure of expert
15 reports will necessitate additional extensions of the deadlines set forth in the Court's order.
16

17 Dated this 15th day of August, 2017.

18 Dated this 15th day of August, 2017.

19 /s/ *Karen D. Moore*

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21 Karen D. Moore, WSBA No. 21328
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1 Dated this 15th day of August, 2017.

2
3 /s/ Katherine Bosch

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5 Mikolaj T. Tempski, WSBA No. 42896
6 Joseph G. Genster, WSBA No. 14968
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15 Kooiman, Jean Leight, Betty Lusk, Joy Maine, Andrew Fletcher, Rachelle Rose, Robin Otto,
16 Roxanne Marler, and Dan Miller

17
18 Dated this 15th day of August, 2017.

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20 /s/ Robert D. Lee

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27 Attorneys for Defendants Gregory Hardy, Sherrise Holland, and Maxim Healthcare Services,
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Dated this 15th day of August, 2017.

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Attorneys for Defendant Cascade Healthcare Services, LLC,

Linet Ngete, and Elaine Gravatt

ORDER

This matter having come before the Court on the Stipulation of the parties, the Court having considered the foregoing stipulation and for good cause shown, IT IS HEREBY ORDERED that the deadline for disclosure of expert testimony is extended from September 6, 2017 to October 6, 2017. IT IS HEREBY FURTHER ORDERED that the new deadline for expert rebuttal testimony pursuant to FRCP 26(a)(22)(D)(ii) is extended to November 6, 2017.

Dated this 16th of Aug., 2017.

ROBERT S. LASNIK
United States District Judge

ROBERT S. LASNIK
United States District Judge

Presented by:

Presented by:

/s/ Karen D. Moore

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